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8
9 **UNITED STATES DISTRICT COURT**
10
11 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

12 GEOFFREY HOLROYD, and JUNE
13 HOLROYD,

14 Plaintiffs,

15 vs.

16 NATIONSTAR MORTGAGE, LLC,

17 Defendant.

18 CASE NO. CV15-2455 RGK (ASx)
19
20 **STIPULATION GRANTING
LEAVE TO FILE SECOND
AMENDED COMPLAINT**

21 [Filed concurrently with [Proposed]
22 Order]

23 JUDGE: Hon. R. Gary Klausner
24 CTRM: 850

25 Action Filed: April 2, 2015
26 Trial Date: None Set

27
28 **WHEREAS** Defendant NATIONSTAR MORTGAGE LLC (“Nationstar”)
was served with the Complaint of Plaintiffs GEOFFREY HOLROYD and JUNE
HOLROYD (“Plaintiffs”) in this action on April 8, 2015;

29
30 **WHEREAS** counsel for Plaintiffs and Nationstar have been meeting and
31 conferring about the pleadings in this action, and potential settlement thereof, since
32 April 22, 2015;

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1 **WHEREAS** Plaintiffs filed and served a First Amended Complaint in this
2 action, as a matter of right, on April 29, 2015;

3 **WHEREAS** Plaintiffs seek to file and serve a Second Amended Complaint, a
4 true and correct copy of which is attached hereto as Exhibit "A," in this action in
5 connection with the parties' ongoing meet-and-confer efforts;

6 **WHEREAS** Plaintiffs and Nationstar agree that Plaintiffs may file and serve
7 the Second Amended Complaint, attached hereto as Exhibit "A," in this action;

8 **WHEREAS** Plaintiffs and Nationstar further agree that Nationstar may raise
9 any and all substantive pleading challenges to the Second Amended Complaint,
10 attached hereto as Exhibit "A," within fourteen (14) days of the electronic docketing
11 of the Court's Order approving this Stipulation; and

12 **WHEREAS** Plaintiffs and Nationstar also agree that, should the Court deny
13 this Stipulation for any reason, Nationstar may raise any and all substantive pleading
14 challenges to the First Amended Complaint in this action (Dkt. #11) within fourteen
15 (14) days of the electronic docketing of the Court's Order denying this Stipulation.

16 **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between
17 Plaintiffs GEOFFREY HOLROYD and JUNE HOLROYD, by and through their
18 attorneys, THE LAW OFFICES OF JOSEPH R. MANNING, JR., A Professional
19 Corporation, and Defendant NATIONSTAR MORTGAGE LLC, by and through its
20 attorneys, GREEN & HALL, A Professional Corporation, that, pursuant to Fed. R.
21 Civ. P. 15(a):

- 22 1. Plaintiffs may file and serve the Second Amended Complaint, attached
23 hereto as Exhibit "A," in this action;
- 24 2. Nationstar may raise any and all substantive pleading challenges to the
25 Second Amended Complaint, attached hereto as Exhibit "A," within
26 fourteen (14) days of the electronic docketing of the Court's Order
27 approving this Stipulation; and

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1 3. In the alternative, Nationstar may raise any and all substantive pleading
2 challenges to the First Amended Complaint in this action (Dkt. #11)
3 within fourteen (14) days of the electronic docketing of the Court's
4 Order denying this Stipulation.

5
6 SO STIPULATED.

7
8 DATED: June 9, 2015

THE LAW OFFICES OF JOSEPH R.
MANNING, JR., A Professional Corporation

9
10 By: /s/ Joseph R. Manning, Jr.
11 Joseph R. Manning, Jr.
12 Attorneys for Plaintiffs
13 GEOFFREY HOLROYD and JUNE
14 HOLROYD

15
16 DATED: June 9, 2015

17
18 GREEN & HALL, A Professional Corporation

19 By: /s/ Michael E. Lisko
20 Howard D. Hall
21 Michael E. Lisko
22 Attorneys for Defendant
23 NATIONSTAR MORTGAGE LLC